

**THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ROME DIVISION**

DONNA GERMON, as Administrator
of the Estate of Rachel M. Germon,
and as surviving parent of
Rachel M. Germon,

Plaintiff,

v.

STEPHEN R. BOYD, SR.,
et al.

Defendants.

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CIVIL ACTION FILE No.
4:23-cv-00100-WMR

**CONSENT MOTION TO EXTEND TIME
TO FILE JOINT PRELIMINARY REPORT AND DISCOVERY PLAN**

Pursuant to Local Rule 26.2(B), the parties respectfully seek a modification of Local Rule 16.2 and move for an extension of time to file the parties' Joint Preliminary Report and Discovery Plan, showing this Honorable Court as follows:

1. Plaintiff filed this case on May 17, 2023. ECF No. 1.
2. Plaintiff served Defendant Sun Path on May 18, 2023, and Sun Path answered Plaintiff's Complaint on June 8, 2023. ECF No. 21.
3. Plaintiff served Defendant Desert Eagle on May 24, 2023, ECF No. 18, and was attempting service on Defendants Stephen R. Boyd and his other affiliated

companies (the Boyd Entities). On June 9, 2023, Mr. Boyd and the remaining Boyd Entities acknowledged service of the Complaint and stipulated that they would answer or otherwise respond to the Complaint by no later than June 28, 2023. ECF No. 22.

4. Per Local Rule 16.1, Plaintiff and Defendant Sun Path are required to conduct their Rule 26(f) Conference by June 24, 2023, sixteen days after Sun Path's Answer. Per Local Rule 16.2, the parties must file their Joint Preliminary Report and Discovery Plan by July 8, 2023, thirty days after the appearance of the first defendant's answer.

5. To facilitate the participation of Defendant Boyd and the Boyd Entities at the parties' Rule 26(f) Conference, the parties seek a short extension of time to conduct their Rule 26(f) conference and to file their Joint Preliminary Report and Discovery Plan

6. Counsel for all parties have conferred and all are available to conduct the Rule 26(f) conference on July 24, 2023, and to thereafter file the Joint Preliminary Report and Discovery Plan by no later than July 28, 2023.

Because this is a slight deviation from the Local Rules, the parties request that the Court enter an Order granting this motion and allowing the parties to have

until July 28, 2023 to file their Joint Preliminary Report and Discovery Plan. A proposed order granting this Motion is attached hereto.

Respectfully submitted this 20th day of June, 2023.

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Application *Pro Hac Vice*

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Boyd and the Boyd Entities***

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[PROPOSED] ORDER

IT APPEARING TO THE COURT that the parties have filed a Consent Motion to Extend Time to File Joint Preliminary Report and Discovery Plan, and that all parties consent to that Motion, it is hereby **GRANTED**.

IT IS HEREBY ORDERED, ADJUDGED, AND DECREED that the parties shall have until July 28, 2023 to conduct their Rule 26(f) Conference and file their Joint Preliminary Report and Discovery Plan.

SO ORDERED, this _____ day of _____, 2023

WILLIAM M. RAY, II
UNITED STATES DISTRICT JUDGE